

JUDICIAL DISTRICT TO NEW HAVEN

CHIEF CLERK'S OFFICE

Defendant.

Dated: November 25, 2022

¹ Plaintiff refused to provide a copy of his complaint in text format upon request. Thus,

Defendant attempted to recreate the Plaintiff's original allegations exactly and believes it was 22 achieved but apologizes in the event there is any minor inconsistencies arising from the need to recreate the text.

run by Parlato. <https://frankreport.com/2022/04/26/three-children-threatened-hollywood-screenwriteruses-police-to-attack-godmother/>. In the published interview, Defendant knowingly made false, incendiary statements about Plaintiff, including but not limited to, that he: abused and is abusing his children; produced pornography; committed larceny; is a thief; and did not financially support his (now former) spouse. In addition to falsely accusing him of these morally reprehensible crimes, Defendant deliberately made additional, insidious misrepresentations about Plaintiff and shared confidential records that further defamed him and put him in a false light. Her malicious intentional acts have caused him extreme emotional distress and significant financial harm.

Defendant elected to publish with The Frank Report knowing that since October 3, 2021 that site has published over 48 (and counting) articles all falsely accusing Plaintiff of malignant conduct, including pedophilia, child abuse, possessing/viewing child pornography, bribery, grand larceny and RICO conspiracy. The site has also published confidential information about his three minor children, including their psychiatric records. As will be explained, the children's peers have seen the site and subsequently subjected the children to brutal ridicule and humiliation. This was all known to Defendant as Plaintiff had advised her of same, and yet that is where she chose to publish her damning lies.

On or about April 22, 2022, Defendant also provided information about Plaintiff to The Family Court Circus, a virulently anti-Semitic, racist, homophobic website targeting the Connecticut family courts. This blog also published a link to Defendant's entire interview. <https://thefamilycourtcircus.com/2022/04/22/thin-blue-threats/>.

Defendant knows that since January 2021, Family Court Circus has published over 150 articles falsely accusing Plaintiff of the same crimes as The Frank Report and exposing private, sensitive information about the children, including the custody evaluation, which was under court seal.

In order to give her statements a veneer of authority, Defendant referenced her long-standing, "close" relationship to Plaintiff's former spouse and her current employment as a school nurse. To add still more artificial luster still to her deceptive narrative, Defendant published purported "evidence," including screenshots of confidential records, which she published out of context, and omitted material information to create a wildly false light portrait of Plaintiff.

On May 3, 2020, Plaintiff sent (via email and USPS) to Defendant a "cease and desist" letter, stating that Defendant's published falsehoods had defamed him, invaded his privacy by false light and inflicted extreme emotional distress on him (the "Letter"). He requested that she: cease publishing the falsehoods and misrepresentations as well as the confidential information about his children; publish a refutation of the numerous falsehoods; and formally apologize for her life-altering false allegations and violations of privacy. The Letter afforded Defendant a ten (10) day opportunity to correct her published falsehoods; if she did not so respond, Plaintiff advised he would be forced to pursue legal action to address her many lies.

It has now been more than sixty (60) days, Defendant has not responded, even to offer an

apology for so callously violating the children's privacy and causing them upset. That Defendant acted with knowing disregard for the truth - malice - not only makes her conduct more egregious, it makes her dangerous. The law does not tolerate such hateful, amoral, life-altering misconduct. Plaintiff brings this complaint to vindicate this principle and to right the contemptible wrongs Defendant has committed against Plaintiff.

JURISDICTION AND VENUE

Both parties are full-time residents of Connecticut and fully subject to its jurisdiction. Pursuant to 51-345 of the Connecticut General Statutes, venue properly lies in this Judicial District in that Plaintiff resides in this Judicial District.

Requested Revision:

[Deletion]

Reason for Revision:

The Plaintiff's portion of the complaint here runs afoul of Practice Book § 10-1 in that it is not divided into paragraphs numbered consecutively, with each paragraph containing as nearly as may be a separate allegation. Rather it is not numbered at all, making it difficult to indicate what an answer would be specifically responsive to. Defendant contends there is no room for a "Summary of Action" in Practice Book § 10-1 and hence it is inherently and designed to be repetitive, and thus is improper. Practice Book §10-35.

It also contains unnecessary and inflammatory commentary by the Plaintiff about third parties such as his description of a third party's website as "virulently anti-Semitic, racist, homophobic. [etc.]" It also improperly makes reference to Internet postings that are not exhibits or intended to be. It also contains highly descriptive subjective characterizations of the Plaintiff's intent and the Plaintiff herself (i.e. "Defendant . . . is dangerous . . . the law does not tolerate such hateful, amoral, life-altering conduct."). This material is "unnecessary, repetitious, scandalous, impertinent, immaterial, or otherwise improper" and should be deleted. Practice Book §10-35. (providing for deletion of material in addition to more complete or particular statements). For

these reasons, the suggested revision of it, (deletion), should occur.

Objection to Requested Revision and Reasons Therefor:

Please see attached page.

Second Request to Revise:

Portion of Pleadings Sought to be Revised:

[All of paragraphs 1-6 under "FACTUAL ALLEGATIONS."]

A. Relationship with Defendant

1. Defendant has been a friend of Plaintiff's former spouse, Karen Riordan Ambrose ("Riordan"), since they went to college together over 35 years ago. Defendant was in the couple's wedding party and is the godmother to their middle child. Defendant and Plaintiff got along well; in fact, Plaintiff arranged for Defendant to audition on two network television shows even though she had very limited professional acting experience.
2. Despite this cordial relationship, Defendant and Riordan often excluded Plaintiff from joining them with the children at events, such as Broadway plays and even stay-away vacations. Nevertheless, Plaintiff maintained a friendly rapport with Defendant.
3. Because Defendant's misconduct is so connected to the dissolution of Plaintiff and Riordan's marriage, a brief factual background will be helpful: In July 2019, Plaintiff filed for divorce in Bridgeport Superior Court, as the family resided in Westport. Plaintiff sought shared custody of the three children, then 13, 13 and 10, and though he had been the sole provider and Riordan offered to split their assets 50/50. (Even during the three years before the couple had children, Riordan was never employed outside the home throughout the duration of the marriage except as a tutor to one middle school student). Plaintiff made this "most equitable" offer to preclude any legal battle.
4. Riordan never responded to this offer. Within two weeks after Plaintiff filed, Riordan began engaging in such seriously disturbing, ever escalating misconduct regarding the children that on April 24, 2020 the court awarded Plaintiff temporary sole physical and legal custody and ordered a 90-day "no contact" period for Riordan, after which she could have supervised visitation. Almost immediately, she violated the no contact order, and continued to do so many times - even as she was held in contempt for her behavior.
5. In July 2020, the couple entered a Supervised Visitation Agreement filed with the court. Within 48 hours, Plaintiff completed his paperwork, the required in-take interview and paid the \$7500 retainer in full to insure the children could see their mother. However, Riordan waited until November to contact the supervisor, never completed the paperwork and never scheduled a visit. Other than one deeply troubling episode, which will be explained and which involved Defendant, Riordan hasn't seen the children since April 2020.
6. Defendant, who identifies herself as Riordan's "best friend," is, on information and belief,

thoroughly aware of all of the above circumstances.

Requested Revision:

1. Defendant has been a friend of Plaintiff's former spouse, Karen Riordan Ambrose ("Riordan"), since they went to college together over 35 years ago. Defendant was in the couple's wedding party and is the godmother to their middle child. Defendant and Plaintiff got along well.
2. Defendant's misconduct is very connected to the dissolution of the Plaintiff's and Riordan's marriage.

Reason for Revision:

The Plaintiff's portion of the complaint here runs afoul of Practice Book § Practice Book §10-35 in that it is largely "unnecessary, repetitious, [somewhat] scandalous, impertinent, immaterial, or otherwise improper" and should be deleted. Practice Book §10-35. (providing for deletion of material in addition to more complete or particular statements). Simply put, it is unnecessary to have 6 detailed paragraphs on the "relationship with the Defendant" and reads more of a descriptive, subjective, commentary for a magazine article than a group of concise allegations. The "brief factual background" of the "dissolution of Plaintiff's and Riordan's marriage" is unnecessary and has immaterial portions such as comments on reasons for Plaintiff's actions on detailed issues related to his divorce.

The revision liberally retains some basic facts that may be pertinent to the Plaintiff's allegations, *albeit* largely for background. In addition, the revision corrects the Plaintiff's failure to use "plain and concise" statements. Practice Book §10-1. For these reasons, the suggested revision of it, should occur.

Objection to Requested Revision and Reasons Therefor:

Please see attached page

C

Third Request to Revise:

Portion of Pleadings Sought to be Revised:

[Paragraphs 10 through 16 of complaint after "FACTUAL ALLEGATIONS"]

10. A significant number of the defamatory statements Defendant made against Plaintiff originated with the following incident: In December 2020, Riordan obtained a Temporary Restraining Order against Plaintiff after falsely alleging that he sexually abused two of the children and was a threat to her. At an emergency hearing held less than 24 hours later, the same judge was advised of the misrepresentations made by Riordan. The judge vacated the TRO and ordered custody immediately restored to Plaintiff. But by then, Riordan, who had not appeared at the hearing, had fled her Guilford home with the children and was hiding in a hotel 20 miles away.
11. At the hotel, Riordan left the children alone in the room with Manuel Gomez, who she had hired as a "private investigator" to follow Plaintiff. Gomez has a lengthy violent criminal record and was fired by the NYPD for cause, including witness tampering and gang affiliations.
12. Gomez made it clear to the children that the only way they could see their mother was to say that their father abused them. Then, as he filmed them, Gomez questioned the children about this supposed abuse. Shortly afterward, Riordan took the children to Connecticut Children's Hospital in Hartford (the "Hospital") and had them repeat the allegations discussed with Gomez.
13. However, when the children were questioned by Hospital personnel privately, away from their mother, the stories of abuse quickly "fell apart" and it was determined that the children had been coached. This was later confirmed by DCF. While all of this was going on, Plaintiff did not know where Riordan and the children were. She did not answer repeated calls from the judge, who tried to reach her several times from court, or the Guilford Police, whose assistance Plaintiff had sought. Just before a "Silver Alert" was to go out on the children, the police finally located Riordan at the hotel by "pinging" her phone.
14. When the police arrived at the hotel, Riordan refused to honor the custody order. For over four hours, officers attempted to reason with her. During this time, in front of the children, Riordan made many phone calls alleging abuse by Plaintiff and critical of the judge, GAL, police, all of whom she said were working against her and the children. During this time, Riordan was in touch with Defendant via phone.
15. Riordan had the couple's daughter "live stream" the hours-long incident at the hotel. When police showed Plaintiff the stream (he was in his car in the hotel parking lot), in order to protect the children from their mother's erratic behavior, he agreed to allow the children to be released to a DCF caseworker, who would take them to spend that night at the home of the Defendant, who was the only person Riordan would release the children to.

Requested Revision:

In December 2020 the Plaintiff's children were placed in DCF custody temporarily, and with both parents' consent, that resulted in the children being placed in the Defendant's temporary custody.

Reason for Revision:

The Plaintiff's portion of the complaint here runs afoul of Practice Book § Practice Book §10-35 in that it is largely "unnecessary, repetitious, [somewhat] scandalous, impertinent, immaterial, or otherwise improper" and should be deleted. Practice Book §10-35. (providing for deletion of material in addition to more complete or particular statements). The Plaintiff introduces this segment by alleging "A significant number of the defamatory statements Defendant made against the Plaintiff originated with the following incident:" and then goes on 7 more paragraphs of unnecessary and immaterial statements. Simply put, it is unnecessary to have 6-7 detailed paragraphs on what is almost exclusively the Plaintiff venting about his ex-wife's supposed wrongdoing and the Plaintiff's subjective descriptions of activities of other third parties. For example, Plaintiff introduces a "Manuel Gomez" into the story, a supposed cohort of his ex-wife, and characterizes him as having a "lengthy violent criminal record [and] gang affiliations." This fits all of the different types of reasons why this entire portion should not remain (probably scandalous or maybe immaterial are the leading reasons). The Plaintiff's statements should also be construed as argumentative and improper.

In addition, the revision corrects the Plaintiff's failure to use "plain and concise" statements. Practice Book §10-1.

The revision liberally retains the basic facts that may be pertinent to the Plaintiff's allegations, *albeit* largely for background. For these reasons, the suggested revision of it, should occur.

8

Objection to Requested Revision and Reasons Therefor:

Please see attached page.

Fourth Request to Revise:

Portion of Pleadings Sought to be Revised:

[Paragraph 17 of Complaint under "FACTUAL ALLEGATIONS."]

17. The next day, at yet another hearing which Riordan did not attend, the court issued yet another order immediately ordering custody be restored to Plaintiff. He texted a screen shot of that order to Defendant, and asked her to call DCF, the police or the guardian ad litem to confirm that the order was valid and to get any questions she may have answered. He did this so Defendant would not refuse the order in front of the children the way Riordan had the night prior.

Requested Revision:

In December 2020 after the Plaintiff's children were placed in the Defendant's custody through DCF with the children's parent's consent, the probate court issued an order placing the children in the Plaintiff's custody. The Plaintiff texted a screen shot of the court order to Defendant's phone number, and asked her to call DCF, the police, or the guardian ad litem to confirm that the order was valid and to get any questions she may have answered.

Reason for Revision:

The portion of the allegation sought to be eliminated here runs afoul of Practice Book § Practice Book §10-35 in that it is "unnecessary, . . . impertinent, immaterial, or otherwise improper" and should be deleted. Practice Book §10-35. (providing for deletion of material in addition to more complete or particular statements). It is also inflammatory, argumentative, and to put it in everyday language, not productive, as the Plaintiff continues to take jabs at his ex-wife (i.e. "yet another hearing which Riordan [Plaintiff's ex-wife] did not attend.") that are minute details, have no relation to the Defendant's alleged wrongful acts, and are likely to be unknown to the Defendant, *inter alia*.

In addition, the revision corrects the Plaintiff's failure to use "plain and concise" statements. Practice Book §10-1.

The revision liberally retains the basic facts that may be pertinent to the Plaintiff's allegations, *albeit* largely for background. For these reasons, the suggested revision of it, should occur.

Objection to Requested Revision and Reasons Therefor:

Please see attached page.

Fifth Request to Revise:

Portion of Pleadings Sought to be Revised:

[Paragraph 18 under "Factual Allegations"]

18. Defendant called no one. Instead, she unilaterally decided not to comply with the court order and returned the children to the Hospital. She later claimed that she had determined they seemed "upset" to her at the prospect of going home. Despite Defendant's brazen attempt to manipulate custody by defying the court order, the Hospital honored the order and immediately released the children to Plaintiff when he arrived. He wanted no further contact with Defendant nor did he want any action taken against her or Riordan because he didn't want to escalate already unpleasant situation.

Requested Revision:

Defendant called no one in response to the Plaintiff's text. Instead, she unilaterally decided not to comply with the court order and returned the children to the Hospital. She later claimed that she had determined they seemed "upset" to her at the prospect of going home. The Hospital honored the order and immediately released the children to Plaintiff when he arrived.

Reason for Revision:

The first omitted phrase (at the beginning of the third sentence) is repetitive, unnecessary, and argumentative. The second omitted sentence (last sentence) speaks to Plaintiff's intent and desires that is not relevant or necessary, and although it is self-serving to essentially to paint him in a good light, something Defendant certainly would not be privy to and has no bearing on the legal claims at hand. Practice Book §10-35. In addition, the revision corrects the Plaintiff's

failure to use "plain and concise" statements. Practice Book §10-1.

Objection to Requested Revision and Reasons Therefor:

Plaintiff does not object to the requested revision.

Sixth Request to Revise:

Portion of Pleadings Sought to be Revised:

Paragraph 19 under "Factual Allegations"

19. Subsequent to this incident, Defendant - by her own admission - continued to make allegations against Plaintiff to DCF, the police and school counselors even though she had not seen or spoken with the children and, on information and belief was relying solely on the word of Riordan, who was objectively troubled. To Plaintiff's knowledge, Defendant's most recent call to authorities regarding the children was in March 2022. To repeat: Defendant has never substantiated a single one of her allegations and even authority has dismissed all of her claims as baseless.

Requested Revision:

⁵
[Deletion]

Reason for Revision:

This paragraph speaks to the Defendant's report of allegations against the Plaintiff to "DCF" that are not expressly stated under any of the counts. (Rather it is Defendant's publishing statements to a reporter there were subsequently posted). Arguably, for that reason, it appears and may be that Plaintiff is not raising Defendant's alleged reports to DCF as a wrongdoing he seeks relief for. In that case, this paragraph, although it may have been therapeutic to write, serves no purpose legally and should be deleted as it runs afoul of Practice Book §10-35 as being unnecessary and immaterial.

Simply put, it is ambiguous whether Plaintiff is raising the Defendant's alleged reports to DCF as wrongdoing and seeks relief from them. In the event that Plaintiff is indeed, then the revision should not occur. Defendant concedes this request should not be granted in the event

Plaintiff seeks to raise those claims.

Objection to Requested Revision and Reasons Therefor:

Please see attached page.

Seventh Request to Revise:

Portion of Pleadings Sought to be Revised:

[Paragraph 20 under "Factual Allegations"]

20. In January 2022, Defendant began sending the couple's daughter no fewer than five unusually expensive, albeit belated, Christmas packages. She sent nothing to the couple's two sons. As Defendant was well aware, Riordan has used third parties to secretly communicate false allegations against Plaintiff to the daughter. These false allegations have included that he is under investigation by the FBI, produces child pornography and is engaged in child sex trafficking. So when Defendant sent this barrage of gifts directly to the daughter, Plaintiff requested that she send everything through him. Defendant responded with outrage and invective.

Requested Revision:

[Deletion]

Reason for Revision:

Simply put, this paragraph does not serve a legitimate legal purpose and does nothing more than stoke the fires of animosity between the parties because it pertains to facts unnecessary and immaterial to the Plaintiff's claims and is not pertinent background. Again, although it may have been therapeutic to write for the Plaintiff, it serves no legitimate legal purpose and should be deleted as it runs afoul of Practice Book §10-35 as being unnecessary and immaterial.

Objection to Requested Revision and Reasons Therefor:

Plaintiff does not object to the requested revision.

Eighth Request to Revise:

Portion of Pleadings Sought to be Revised:

[Paragraph 21 under "Factual Allegations"]

21. On March 2, 2022, classmates of the two older children discovered articles published on line that contained the children's confidential psychological and other records, photos and

the false allegations that they had been sexual and emotionally abused by their father. As explained, these articles were published on the very same sites that Defendant would choose to publish her interview, The Frank Report and The Family Court Circus.

22. Requested Revision

[Deleted]

Reason for Revision:

This paragraph makes allegations about what the Plaintiff's children's classmates "discovered." A plain reading of the paragraph indicates it has nothing to do with a claim raised by the Plaintiff. Most generously, the paragraph as a whole could only point to or support some sort of wrongdoing towards the Plaintiff's children, and since none of them are a party to this action, it is irrelevant. For these reasons, this paragraph does not serve a legitimate legal purpose and does nothing more than stoke the fires of animosity between the parties because it, at best, pertains to allegations of poor treatment by the Defendant of the Plaintiff's children, and these allegations are unnecessary and immaterial to the Plaintiff's claims and is not pertinent background either. Again, although it may have been therapeutic to write for the Plaintiff, it serves no legitimate legal purpose and should be deleted as it runs afoul of Practice Book §10-35 as being unnecessary and immaterial.

Objection to Requested Revision and Reasons Therefor:

Please see attached page.

Ninth Request to Revise:

Portion of Pleadings Sought to be Revised:

[Paragraph 22 under "Factual Allegations"]

22. On that day, knowing her mother was the source of the confidential records and false allegations, the daughter sent an e-mail directly to her, pleading that she remove the articles. Riordan did not respond to her daughters pleas. On information and belief, by then Riordan was living in Florida with the publisher of The Frank Report. But Riordan had been claiming she lived with Defendant in Glastonbury, so Plaintiff texted Defendant and asked her to intercede and have Riordan remove he articles on behalf of the children.

Defendant responded aggressively, but she did not address the published articles or the child's requests.

Requested Revision

Plaintiff texted Defendant and asked her to have Riordan remove articles that were published on his children's behalf. Defendant response did not directly address the request made to her.

Reason for Revision:

Communications and wrongdoing of the Plaintiff's wife are again at hand here. What someone thinks the Plaintiff's ex-wife has done and where she is/was living and requests from children to the Plaintiff's ex-wife are immaterial to any possible claim to be raised against the Defendant. (For these reasons, they run afoul Practice Book §10-35 as being unnecessary and immaterial and these first sentences do not appear in the suggested revision.) So too are likely any possible text exchange between the Plaintiff and Defendant concerning the Plaintiff's ex-wife's alleged publications and wrongdoing, however to give the Plaintiff the most gratuitous evaluation of relevance the suggested revision contains the basic facts presented although only tangentially related to the issues.

In addition, the revision corrects the Plaintiff's failure to use "plain and concise" statements. Practice Book §10-1.

The revision liberally retains some basic facts that may be pertinent to the Plaintiff's allegations, *albeit* largely for background.

Objection to Requested Revision and Reasons Therefor:

Please see attached page.

Tenth Request to Revise:

Portion of Pleadings Sought to be Revised:

[Paragraph 23 under "Factual Allegations"]

14

23. A few weeks later, Defendant invited Plaintiff and the children to her home for Easter. Given her abject hostility toward Plaintiff, including making repeated false allegations against him to authorities and her flat unwillingness to help the children regarding their mother's betrayal of their privacy, he assumed this was an insincere offer designed to needle or provoke. Hoping to end this harassment, he didn't respond. Defendant continued to send the invitation, as did Riordan.

Requested Revision:

Defendant invited Plaintiff and his children to her home for Easter. Plaintiff did not respond. Defendant continued to send the invitation, as did Riordan.

Reason for Revision:

Communications and wrongdoing of the Plaintiff's wife are again at hand here. What someone thinks the Plaintiff's ex-wife has done and where she is/was living and requests from children to the Plaintiff's ex-wife are immaterial to any possible claim to be raised against the Defendant. Practice Book §10-35. (For these reasons, the first sentences do not appear in the suggested revision.).

Plaintiff again references Defendant making "false allegations against him to authorities" as his has in prior paragraphs. Defendant reiterates that it is ambiguous whether Plaintiff is raising the Defendant's alleged reports (here to "authorities" but prior reference was made to "DCF") as wrongdoing and seeks relief from them. In the event that Plaintiff is indeed raising such a claim, then the revision should not occur, or at least reference to the allegation of false reports should remain. Defendant concedes this request, or at least the portion pertaining to the false allegations, should not be granted in the event Plaintiff seeks to raise those claims.

Defendant contends also that any possible text exchange between the Plaintiff and Defendant concerning the Plaintiff's ex-wife's alleged publications and wrongdoing are likely immaterial, however to give the Plaintiff the most gratuitous evaluation of relevance the suggested revision contains the basic facts presented although only tangentially related to the

issues. The revision liberally retains some basic facts that may be pertinent to the Plaintiff's allegations, *albeit* largely for background. In addition, the revision corrects the Plaintiff's failure to use "plain and concise" statements. Practice Book §10-1.

For these reasons, the requested revision of it, should occur.

Objection to Requested Revision and Reasons Therefor:

Please see attached page.

Eleventh Request to Revise:

Portion of Pleadings Sought to be Revised:

Paragraph 25 under "Factual Allegations".

25. On information and belief, Defendant is aware that The Frank Report and The Family Court Circus have published Plaintiff's home address and incited readers to go to his house to seek vigilante justice. In separate incidents, three adult males have come on to his property demanding to see the children. The police were involved and advised Plaintiff to report every incident of trespass. Since Defendant had adamantly refused to leave the property and was hostile to him in front of his daughter, Plaintiff reported the April 21 incident to the Madison Police. They advised that a visit from the police typically calms an antagonistic "civilian" such as Defendant. This is how they had handled the three adult male strangers who had trespassed, and none of them had returned.

Requested Revision:

On information and belief, Defendant is aware that The Frank Report and The Family Court Circus have published Plaintiff's home address and incited readers to go to his house to seek vigilante justice.

[in separate paragraph]

Plaintiff reported the April 21 incident to the Madison Police.

Reason for Revision:

The subject matter to third parties (three adult males), what was said between the Plaintiff and police, and Plaintiff reasoning for taking certain actions unrelated to the claims are not

pertinent to the claims, but rather is immaterial and unnecessary. Practice Book §10-35. In addition, the revision corrects the Plaintiff's failure to use "plain and concise" statements. Practice Book §10-1. The portions remaining are the only factually and legally relevant topics to the claims, arguably, thus they appear in the suggested revision.

Objection to Requested Revision and Reasons Therefor:

Please see attached page.

Twelfth Request to Revise:

Portion of Pleadings Sought to be Revised:

[Paragraph 46 under first cause of action]

46. Defendant made the all of the defamatory statements described under sections A - F above in an article in which she identified Plaintiff and which she caused to be published to the public at large on at least two websites on the Internet, *The Frank Report* and *The Family Court Circus*. When material is published on the Internet it must be regarded as substantially certain to become public knowledge. Publishing defamatory material on multiple sites not only increases the number of people likely to see the misrepresentative and untrue statements about Plaintiff, it enables more meta tags and links to be utilized to draw traffic to those sites and so increases over time the damage done to Plaintiff, as search engines "drive" readers to those sites in perpetuity.

Requested Revision:

Defendant published the interview in *The Frank Report* and *The Family Court Circus* provided a subsequent article that linked to the full interview.

Reason for Revision:

The omitted portion has no bearing on any claim the Plaintiff brings, rather, it raises alleged wrongdoing or bad intent towards non-parties (Plaintiff's children). In addition to it being all of the types of material listed in Practice Book 10-35 (unnecessary, immaterial, and arguably scandalous), it is inflammatory. In addition, the revision corrects the Plaintiff's failure to use "plain and concise" statements. Practice Book §10-1.

Objection to Requested Revision and Reasons Therefor:

Please see attached page.

Thirteenth Request to Revise:**Portion of Pleadings Sought to be Revised.**

[Paragraph 41 under first cause of action]

41. On information and belief, Defendant was not an absentee or neglectful parent, quite the opposite: he was very involved in his children's lives, as uncontested testimony at the Trial established. Plaintiff attended every parent/teacher conference, even those Riordan admitted she skipped because she "didn't respect" or wasn't getting along with the teacher. Unlike Riordan, Plaintiff never missed a little league game or gymnastics tournament. The pediatrician, dentist and audiologist said Plaintiff was "far more likely" to bring the children to their appointments than Riordan, and all three described her as "difficult".

Requested Revision:

Plaintiff was very involved with his children's lives. Defendant was aware that Plaintiff was not an absentee or neglect parent.

Reason for Revision:

The omitted portions speak to details of how the Plaintiff's ex-wife was not involved in the Plaintiff's children's lives, including what the Plaintiff's ex-wife "admitted to" or allegations that the Plaintiff's ex-wife was "not getting along with the teacher." These are unnecessary and improper. Practice Book §10-35. It also speaks to alleged testimony and determinations in apparently a different legal dispute that Defendant was not a party. Since these facts would not be admissible or determinative, they are not material or necessary. In addition, the revision corrects the Plaintiff's failure to use "plain and concise" statements. Practice Book §10-1.

Objection to Requested Revision and Reasons Therefor:

Plaintiff does not object to the requested revision.

Fourteenth Request to Revise:**Portion of Pleadings Sought to be Revised:**

[Paragraph 51 under first cause of action]

51. As explained, in the Letter on May 3, 2022 Plaintiff afforded Defendant the opportunity to correct her published lies. It has now been more than sixty (60) days, not only has Defendant not retracted the falsehoods, she has not shown any remorse or taken responsibility for the harm she has caused (even to Plaintiff's children). Under CGS 552-237, Plaintiff is entitled to compensatory damages.

Requested Revision:

Under CGS 52-237, Plaintiff is entitled to compensatory damages.

Reason for Revision:

The first and first portion of the second sentence has been alleged before, and thus is repetitive. Practice Book §10-35. The second phrase of the second sentence is descriptive and the Plaintiff's subjective opinion "has not shown remorse" and also refers to harm to non-parties, and thus is improper as an allegation. Id. The retained portion is the only factual and proper portion of the allegation.

Objection to Requested Revision and Reasons Therefor:

Please see attached page.

Fifteenth Request to Revise:

Portion of Pleadings Sought to be Revised:

[Paragraph 54 under first cause of action]

54. Defendant's published, life-altering lies about Plaintiff have destroyed his reputation and exposed him to public hatred, contempt and ridicule. Defendant's published lies have pulled apart Plaintiff's extended family and destroyed personal relationships with friends, colleagues and former neighbors. The psychological damage done by the sort defamation and invasion of privacy Defendant has engaged in is severe and can cause suicide and attempted suicide. It has resulted in a diagnosis and need for treatment for Plaintiff. Defendant's very public, false allegations of crimes of moral turpitude have also deprived Plaintiff of business opportunities. Executive recruiters confirm that in today's market, every employer checks a candidate's Internet profile, and the false accusations of immoral, even unlawful conduct that Defendant has publicly made have made Plaintiff "unemployable." This has only added to Plaintiff's emotional harm.

Requested Revision:

Defendant's published, life-altering lies about Plaintiff have destroyed his reputation

and exposed him to public hatred, contempt and ridicule.

[separate paragraph]

Defendant's published lies have pulled apart Plaintiff's extended family and destroyed personal relationships with friends, colleagues and former neighbors. The psychological damage done by the sort of defamation and invasion of privacy Defendant has engaged in is severe. It has resulted in a diagnosis and need for treatment for Plaintiff.

[separate paragraph]

Defendant's very public, false allegations of crimes of moral turpitude have also deprived Plaintiff of business opportunities. Plaintiff is "unemployable."

Reason for Revision:

Plaintiff's reference to "suicide" and "attempted suicide" is scandalous and his reference to a generalized claim of what unnamed "executive recruiters" opine is unnecessary and immaterial. Practice Book §10-35. The requested revision simply excludes the improper material. In addition, the revision corrects the Plaintiff's failure to use "plain and concise" statements. Practice Book §10-1.

Objection to Requested Revision and Reasons Therefor:

Please see attached page.

Sixteenth Request to Revise:

Portion of Pleadings Sought to be Revised:

[Paragraph 55 under first cause of action]

55. That Defendant's published falsehoods have incited people to hate Plaintiff is apparent from the comments from readers responding to her interview in The Frank Report. These readers made blistering statements like, "[Plaintiff] is a monster and clearly mentally unstable" and "Know anything about the alleged N.A.M.B.L.A membership/affiliation of a certain male divorcé in residing Connecticut?" One lengthy comment shows how completely the public will believe and even repeat Defendant's many false allegations, "The court finds [Plaintiff] a HIGH RISK abuser. This is based on input from the father himself. But judge grossman ignored the recommendations of hospital and dcf and forced these kids back with the father immediately. This is corruption. Same players: Jessica Biren caverly, custody evaluator and

judge jane grossman. Jocelyn Hurwitz and Janis Laliberte are GALs known to traffic children. In The Worst Interest of the Child: Trafficking Children Through Family Court. The court isn't making life better fir this clown. Just using him for all his money. He made a deal with the devil." [sic]. These comments alone put to rest any doubt about the extraordinarily life-altering negative impact Defendant's defamation has had on Plaintiffs reputation and subsequently his emotional and financial states.

Requested Revision:

[Deletion]

Reason for Revision:

The entire paragraph is dedicated to unnamed, non-parties alleged statements to support the argument they "hate" the Plaintiff to imply Plaintiff's damages are high and ends with the argumentative and persuasive closer that the comments "put to rest any doubt about the . . . impact . . . on . . . [the Plaintiff's] emotional and financial states." As with most of the paragraphs, it contains the Plaintiff's characterizations like "blistering." Leaving alone the fact it is highly likely Defendant would not be able to properly respond to Plaintiff's opinions and characterizations, and it is repetitive in that the alleged severity of the damages from the alleged defamation has been plead. Practice Book §10-35. Although not necessary to do so, it also does not illuminate any of the Defendants acts. For these reasons it is unnecessary, repetitive, and immaterial. Id. In addition, the revision corrects the Plaintiff's failure to use "plain and concise" statements. Practice Book

§10-1. It also corrects Plaintiff's failure for each paragraph to be as near as may be a separate allegation. Practice Book §10-1.

Objection to Requested Revision and Reasons Therefor:

Please see attached page.

Seventeenth Request to Revise:

Portion of Pleadings Sought to be Revised:

[Third Case of Action, 3 paragraph]

In considering intentional infliction of emotional distress it bears emphasis that the primary focus is on the question of foreseeability and not on the physical manifestation of the emotional injury. Any reasonable person would foresee that Defendant's conduct specifically publishing falsehoods about Plaintiff, including that he is guilty of crimes of moral turpitude - would create an unreasonable risk of causing Plaintiff emotional distress. Moreover, as Defendant boasts multiple times in her published remarks, she has professional-level experience with mental health issues and so she has an even greater understanding of the emotional distress her willful, malicious defamation would likely cause. In addition, Plaintiff made Defendant aware of the emotional harm the publication of false information causes when he sought her help on behalf of his children to get Riordan to remove posts on The Frank Report and The Family Court Circus. Having this self-described enhanced awareness of psychological matters, Defendant still made her damaging, false statements against Plaintiff, which manifests not only malice, but extreme malice.

Requested Revision:

[Deletion]

Reason for Revision:

The paragraph presents more of the Plaintiff's subjective opinion and is more of a persuasive argument than a short and concise statement of the material facts. Practice Book §10-1. It is also repetitive since the Plaintiff has plead what he alleges was said about him in multiple prior paragraphs. Practice Book §10-35. As with most of the paragraphs, it contains the Plaintiff's characterizations like "boasts multiple times her willful, malicious defamation . . . having this self-described enhanced awareness." It also is unnecessary and immaterial as it raises, (an on-going theme in the complaint) claims that would be against the Plaintiff's children, not him, and since the children are not parties, this is unnecessary and immaterial. Id. Although not necessary to do so, it also does not illuminate any of the Defendants acts. It also corrects Plaintiff's failure for each paragraph to be as near as may be a separate allegation. Practice Book §10-1. For these reasons, the allegation serves no purpose and runs afoul of the Practice Book and should be deleted.

Objection to Requested Revision and Reasons Therefor:

Plaintiff does not object to the requested revision.

Eighteenth Request to Revise:**Portion of Pleadings Sought to be Revised:**

[Third cause of action, paragraph 9]

As explained, when Plaintiff sought help from the police because of Defendant's misconduct, she retaliated by publishing her false allegations against him. But she has continued through the present to harass him. On July 11, 2022, she sent him unsolicited, mean-spirited, accusatory texts. Unless restrained by this Court, Defendant will continue to pursue her malicious and unlawful conduct, including but not limited to defaming Plaintiff, invading his privacy by false light and subjecting him to severe emotional distress, all of which have harmed and will continue to harm him emotionally and financially.

Requested Revision:

As explained, when Plaintiff sought help from the police because of Defendant's misconduct, she retaliated by publishing her false allegations against him. But she has continued through the present to harass him. On July 11, 2022, she sent him unsolicited, mean-spirited, accusatory texts, which were.

[text of texts, separated]

[separate paragraph/allegation]

Unless restrained by this Court, Defendant will continue to pursue her malicious and unlawful conduct, including but not limited to defaming Plaintiff, invading his privacy by false light and subjecting him to severe emotional distress, all of which have harmed and will continue to harm him emotionally and financially.

Reason for Revision:

Defendant leaves the Plaintiff's allegation intact except for the addition of the actual alleged texts that were sent (and separating some subject matter to make it shorter and more precise) to simply see what exactly is being complained of, as it should be, to enable her to better respond. Defendant seeks "a more complete or particular statement of the allegations". Practice Book § 10-35.


Objection to Requested Revision and Reasons Therefor:

Plaintiff does not object to the requested revision.

No Oral Argument Requested No
Testimony Required

Dated: November 25, 2022

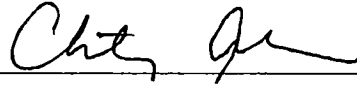
Respectfully submitted,
The Plaintiff,



Mr. Christopher A. Ambrose
381 Horsepond Road
Madison, CT 06443
ca0515@aol.com

Certificate of Service

I hereby certify that the foregoing was served on November 25, 2022 by electronic mail to the counsel of record, George E. Bourguignon, Jr. at gbourguignon@bourguignonlaw.com.



Christopher Ambrose

381 Horsepond Road

Madison, CT 06443

ca0515@aol.com